

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF DELAWARE**

<p>JAMES M. BAKER, On Behalf of Himself and All Others Similarly Situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>MBNA CORP., <i>et al.</i>,</p> <p style="text-align: center;">Defendants.</p>	<p>Case No. 1:05-cv-00272-GMS</p> <p><u>CLASS ACTION</u></p>
<p>ROCHELLE PHILLIPS, On Behalf of Herself and All Others Similarly Situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>MBNA CORP., <i>et al.</i>,</p> <p style="text-align: center;">Defendants.</p>	<p>Case No. 1:05-cv-00277-GMS</p> <p><u>CLASS ACTION</u></p>
<p>ROBERT WILKINS, On Behalf of Himself and All Others Similarly Situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>MBNA CORP., <i>et al.</i>,</p> <p style="text-align: center;">Defendants.</p>	<p>Case No. 1:05-cv-00287-GMS</p> <p><u>CLASS ACTION</u></p>

<p>LEONARD BRONSTEIN, On Behalf of Himself and All Others Similarly Situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>MBNA CORP., <i>et al.</i>,</p> <p>Defendants.</p>	<p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>Case No. 1:05-cv-00289-GMS</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p><u>CLASS ACTION</u></p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p>
<p>GREGG PENN, On Behalf of Himself and All Others Similarly Situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>MBNA CORP., <i>et al.</i>,</p> <p>Defendants.</p>	<p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>Case No. 1:05-cv-00293-GMS</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p><u>CLASS ACTION</u></p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p>
<p>CLIFFORD W. JONES, On Behalf of Himself and All Others Similarly Situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>MBNA CORP., <i>et al.</i>,</p> <p>Defendants.</p>	<p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>Case No. 1:05-cv-00316-GMS</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p><u>CLASS ACTION</u></p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p>

<p>MICHAEL D. BLUM, On Behalf of Himself and All Others Similarly Situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>MBNA CORP., <i>et al.</i>,</p> <p>Defendants.</p>	<p>Case No. 1:05-cv-00372-GMS</p> <p><u>CLASS ACTION</u></p>
<p>SCOTT KIMBALL, On Behalf of Himself and All Others Similarly Situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>MBNA CORP., <i>et al.</i>,</p> <p>Defendants.</p>	<p>Case No. 1:05-cv-00643-GMS</p> <p><u>CLASS ACTION</u></p>
<p>VIRGINIA McMATH, On Behalf of Himself and All Others Similarly Situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>MBNA CORP., <i>et al.</i>,</p> <p>Defendants.</p>	<p>Case No. 1:05-cv-00644-GMS</p> <p><u>CLASS ACTION</u></p>

## STIPULATION AND ORDER

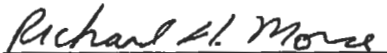
**WHEREAS** putative class member Activist Investmentgesellschaft mbH  
for account of the PT-Master fund, represented by the law firm of Milberg Weiss Bershad

& Schulman LLP, has filed a motion for consolidation of the above-referenced actions, for appointment as Lead Plaintiff and for approval of selection of Lead Counsel, and

WHEREAS said motion is unopposed as of the date below,

**IT IS HEREBY STIPULATED AND AGREED**, by and between undersigned counsel for the parties herein and subject to the Order of this Court, that (i) Lead Plaintiff will serve and file a consolidated amended complaint no later than 60 days after a decision is entered on the pending motions for appointment of Lead Plaintiff and approval of Lead Counsel, (ii) Defendants will have 60 days thereafter to answer, move to dismiss or otherwise respond to the consolidated amended complaint, (iii) in the event that a motion to dismiss is made by one or more Defendants, Lead Plaintiff will have 60 days to file its answering brief in response to such motion to dismiss and the moving Defendant or Defendants will have 45 days to submit their reply.

October 12, 2005

  
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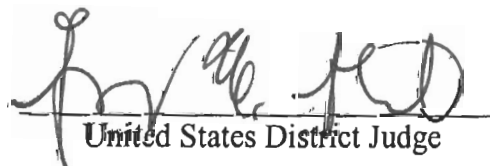
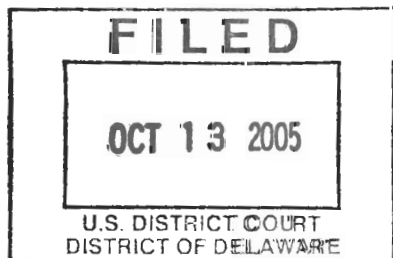
*Attorneys for Plaintiffs Rochelle Phillips and Clifford W. Jones  
and Proposed Lead Plaintiff Activist Investmentgesellschaft mbH*



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Michael D. Blum, Scott Kimball and Virginia McMath*

SO ORDERED, this <sup>14</sup>13 day of October, 2005



United States District Judge